

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL.

Defendant.

Civil Action No.

04-cv-10357-RCL

**MOTION OF HANANEL FOR LEAVE TO FILE REPLY TO ADELSON'S SECOND
SUPPLEMENTARY BRIEF AND AFFIDAVIT**

Defendant Moshe Hananel (“Hananel”) moves the Court for leave to file a Reply Memorandum and the Fourth Affidavit of Hananel, both of which are filed herewith, in reply to Adelson’s Second Supplementary Brief filed April 29, 2005 (“2d Supp. Brief”). As grounds, Hananel states that Adelson’s 2d Supp. Brief includes twenty-six exhibits but consists almost entirely of invective concerning Hananel’s credibility, and the 26 exhibits are generally mischaracterized in the text. Adelson’s 2d Supp. Brief was itself filed without leave of Court, and was filed without notice or discussion among counsel as to the scheduling of renewed motions to dismiss following discovery. Hananel has now filed a renewed motion, and respectfully suggests that the present filings will assist the Court in evaluating the motion in light of discovery to date.

WHEREFORE, the Court should allow Hananel to file the Fourth Affidavit of Moshe Hananel In Support of Motions to Dismiss For Lack of Personal Jurisdiction and For Forum Non

Conveniensi, and the Reply Memorandum Of Hananel To Adelson's Second Supplementary Brief In Opposition To Hananel's Motion to Dismiss.

Respectfully submitted,

Dated: June 22, 2005

I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by mail - hand on June 22, 2005.

[Signature]

MOSHE HANANEL

By His Attorneys:

[Signature]
James A. G. Hamilton (MA Bar # 218760)

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